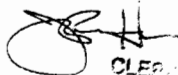


UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

FILED

MAR 15 2011


CLERK

UNITED STATES OF AMERICA,

CR 11-50029

Plaintiff,

INDICTMENT

vs.

Mailing Threatening Communications
(18 U.S.C. § 876(d))

JEFFREY J. GRIMES,

Repeated Telephone Calls
(47 U.S.C. § 223(a)(1)(D))

Defendant.

Anonymous Telephone Harassment
(47 U.S.C. § 223(a)(1)(C))

Repeated Harassing Communication
(47 U.S.C. § 223(a)(1)(E))

Stalking
(18 U.S.C. §§ 2261A(2), 2261(b)(5) & (6)
& 2265A(a))

The Grand Jury charges:

COUNTS I-III

**Mailing Threatening Communications
(18 U.S.C. § 876(d))**

On or about between November, 2009, and March, 2010, in the District of South Dakota, and elsewhere, the defendant, Jeffrey J. Grimes, knowingly and with intent to extort money and other things of value from the following victims, did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and caused to be delivered by the Postal Service according to the

directions thereon, a communication, addressed to the following victims, and containing a threat to injure the reputation of the following through the means described below, all in violation of 18 U.S.C. § 876(d):

Count	Letter Addressee/ Victim	Amount Demanded	Threat Made To Reputation
I	Mark Kari	\$10,000	Threat made to injure the reputation of Mark Kari Sr. and Linda (Kari) Fall by instigating defamatory public gossip in Bison, South Dakota, about the alleged interracial and adulterous affair of Linda (Kari) Fall, and by placing defamatory engravings on this topic on the tombstone of the deceased Mark Kari Jr.
II	Mark Kari	The "debt owed" by Mark Kari's daughter Linda (Kari) Fall	Threat made to injure the reputation of Mark Kari Sr. and Linda (Kari) Fall, by sending defamatory letters to other family and Bison, South Dakota, community members regarding the alleged interracial and adulterous affair of Linda (Kari) Fall.
III	David Kari	\$20,000	Threat made to injure the reputation of David Kari and his family, and Linda (Kari) Fall by making defamatory phone calls to Bison, South Dakota, community members regarding the alleged interracial and adulterous affair of Linda (Kari) Fall.

COUNTS IV-V

Repeated Telephone Calls 47 U.S.C. § 223(a)(1)(D)

On or about between the dates set forth below, in the District of South Dakota, and elsewhere, the defendant, Jeffrey J. Grimes, in interstate

communications, made or caused the telephone of the following victims to repeatedly and continuously ring within the District of South Dakota, with intent to harass a person at the called number, all in violation of 47 U.S.C. § 223(a)(1)(D):

Count	Dates	Victims
IV	January 1 and January 10, 2011	Mark and Bernice Kari
V	January 1 and January 10, 2011	Dan and Marcie Kari

COUNTS VI-X

Anonymous Telephone Harassment (47 U.S.C. § 223(a)(1)(C))

On or about the dates set forth below, in the District of South Dakota, and elsewhere, the defendant, Jeffrey J. Grimes, in interstate communications, made a telephone call to Dan and Marcie Kari, without disclosing his identity and with intent to annoy, abuse, threaten, and harass a person at the called number and who received the communications, all in violation of 47 U.S.C. § 223(a)(1)(C):

Count	Date
VI	January 4, 2011
VII	January 10, 2011
VIII	January 23, 2011
IX	January 24, 2011
X	January 25, 2011

COUNTS XI-XV**Repeated Harassing Communication
47 U.S.C. § 223(a)(1)(E)**

On or about between the dates set forth below, in the District of South Dakota, and elsewhere, the defendant, Jeffrey J. Grimes, in interstate communications, made repeated interstate telephone calls to Dan and Marcie Kari, during which communication ensued in the form of several harassing voice messages, solely to harass a person at the called number and the person who received the communication, all in violation of 47 U.S.C. § 223(a)(1)(E):

Count	Date
XI	January 4, 2011
XII	January 10, 2011
XIII	January 23, 2011
XIV	January 24, 2011
XV	January 25, 2011

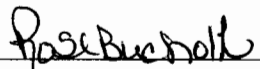
COUNTS XVI-XVII**Stalking
(18 U.S.C. §§ 2261A(2), 2261(b)(5) & (6) & 2265A(a))**

On or about between December, 2010, and March, 2011, in the District of South Dakota, and elsewhere, the defendant Jeffrey J. Grimes, with the intent to cause substantial emotional distress to the victims set forth below, used facilities of interstate commerce, the mail and phone, to engage in a course of conduct which caused substantial emotional distress to these victims. This conduct was committed in violation of 18 U.S.C. § 2261A(2), and in violation of a current protective order for

each of these victims issued by the State of South Dakota, all in violation of 18 U.S.C. §§ 2261(b)(5) & (6) and 2265A(a)):

Count	Victims
XVI	Dan and Marcie Kari
XVII	Mark and Bernice Kari

A TRUE BILL:


FOREMAN

BRENDAN V. JOHNSON
United States Attorney

By:

